UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:	.)	Case No. 16-42122
Deana Brady)	
Debtor)	Chapter 13
)))	Hearing Date: May 11, 2016 Hearing Time: 10:00 a.m. Hearing Location: 5N

MOTION TO EXTEND THE AUTOMATIC STAY AND NOTICE OF HEARING

PLEASE TAKE NOTICE that the Motion to Extend Automatic Stay filed by the Debtors is set for hearing before the Honorable Barry S. Schermer in the Thomas F. Eagleton United States Courthouse, 5th Floor, North Courtroom, 111 South 10th Street, Saint Louis, Missouri on May 11, 2016 at 10:00 a.m.

WARNING: Responses may be filed until the time of the hearing. A copy must be promptly served upon the undersigned. Failure to file a timely response may result in the court granting the relief requested prior to the hearing date.

COMES NOW Debtor, by counsel, and for this Motion state as follows:

- 1. Debtors filed the above-captioned case in good faith on March 29, 2016.
- 2. Debtor previously filed a Chapter 13 case (15-47874) on October 19, 2015 that was dismissed on January 13, 2016 for failure to make plan payments.
- 3. Debtor was unable to make payments due to loss of income, medical issues and inability to work.
- 4. Debtor is currently attending school to obtain employment. Debtor has drastically reduced household expenses. Debtor is expecting Social Security payments to resume in the amount of \$1730 per month within the next 60 days to help supplement income.
- 5. Debtor will enter into a wage order when she returns to work.

6. Debtor seeks an extension of the automatic stay pursuant to 11 U.S.C. 362(c)(3)(B) to all creditors.

WHEREFORE, Debtor prays that this Court enter its Order continuing the automatic stay to all parties of interest until further order or discharge is granted.

RESPECTFULLY SUBMITTED
/s/Deanna A. Foley
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Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was served through the Court's ECF system of by regular mail on April 9, 2016 to:

/s/ Deanna A. Foley

John V. LaBarge, Jr. Chapter 13 Trustee P.O. Box 430908 St. Louis, MO 63143 Ameren PO Box 66529 Saint Louis, MO 63166-6529

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MSD

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